



**Montana  
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Denise Juneau, State Superintendent

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December 4, 2009

Gene Wilhoit, Executive Director, CCSSO  
One Massachusetts Ave, NW, Suite 700  
Washington, DC 20001-1431

Dear Mr. Wilhoit:

The educators of Montana and I welcome the opportunity to respond to the draft of the K-12 mathematics and English language arts standards. The comments are attached with this letter.

The Montana Board of Public Education standards revision process includes the mandate to "consider comments from tribal and school district educators." To this end, a panel of elementary, middle, and secondary educators, along with university professors, thoroughly reviewed the K-12 Common Core draft standards. Each of these educators is well respected in Montana's education community, has extensive knowledge of the state's standards revision process, and are experts in their respective fields.

To summarize, the review panel's recommendations reflect dismay at the incompleteness and unorganized state of the standards. Key components that are missing are:

- acknowledgment of cultural diversity,
- 21<sup>st</sup> century learning skills and concepts, and
- accessible language to all audiences for the documents.

As this document is being completed and revised it is imperative that the input of states is taken into consideration and incorporated in the final documents. It is our hope that the comments from all states will be made public to increase the transparency of this process.

We must have a complete draft of the K-12 Common Core mathematics and English language arts standards and have the opportunity to fully review and respond to the documents in their entirety. An incomplete document delays the Montana alignment study and the actions to move forward with next steps that are appropriate for Montana.

We appreciate your willingness to allow Montana to provide input in such important work for our students. If more information is needed, please contact Assistant Superintendent Nancy Coopersmith at [ncoopersmith@mt.gov](mailto:ncoopersmith@mt.gov) or (406) 444-5541.

Sincerely,

Denise Juneau  
State Superintendent

Attachments

*The Montana Office of Public Instruction provides vision, advocacy, support, and leadership for schools and communities to ensure that all students meet today's challenges and tomorrow's opportunities.*

1. Is the architecture of the draft standards clear and easy to follow? How can we ensure the documents are designed to be accessible for all audiences?

- No, the draft standards are not clear or easy to follow. Perhaps a complete document will eliminate this lack of clarity.
- While there is a progression from broad to specific within the document it would be preferable for the reader to have a grade-by-grade format rather than bands of K-3, 4-5, 6-8. In addition, the relationship between core skills, core text type, and foundations is not always clear. Clear definitions and a graphic representation would eliminate some confusing aspects of the document.
- From an elementary teacher perspective, the architecture of the English language arts and mathematics documents needs to be identical. It cannot be expected that an elementary teacher should have to refer to standards documents that have varying structure; it is imperative that there is consistency in format.

2. In what ways does this early draft convey a coherent vision of the discipline? What else is needed to enhance a coherent vision?

- The vision that is conveyed through this document is clear and definite. Unfortunately, this apparent vision reduces the discipline by eliminating the affective and metacognitive aspects of communication. Communication should be a lifelong experience beyond the walls of a classroom and corporate office; this is not conveyed in this draft.
- To enhance a coherent vision these aspects and the 21<sup>st</sup> century nature of the document need to be addressed. For example, reading and writing for a variety of purposes, communication in real world settings, understanding culture and human conditions through literature, and emerging electronic literacies are missing from this draft.

3. To the extent that the early drafts provide progressions for grade level/grade span expectations does the document present a rigorous, yet reasonable continuum of expectations?

- It is difficult to comment fully on the grade level/grade span expectations because of the repetition of language in the core skills for K-3 and 4-5 and the incomplete presentation of the document. Clarity needs to be brought to the document. The core skills students are expected to "can and do" at each grade level need to be clearly defined.

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- Some of the skills in the document are not developmentally appropriate as presented. Providing the research behind the developmental choices of knowledge and skills would be a valuable addition to the document for educators, parents, students, and all other stakeholders.
- At this point, the document appears to be pushing younger students to become proficient readers of more complex texts. Rigor is of no value if a student isn't engaged in reading a variety of texts. Reading is foundational to a student's education and if we disengage them through text complexity we are short-changing our student's future success. Our goal should be to increase a student's knowledge and skills along with the desire to become a reader.

4. Is the language in the early draft clear, concise, and precise? Please identify any areas where more concision and precision is needed.

- No. The draft has a lot of education-related jargon. If it needs to be accessible to parents, students, and other stakeholders rather than just educators, the language needs to be revised.
- Many of the terms used such as, "outline," "theme," "early on" can be easily misinterpreted. A glossary must be included.
- It is vitally important that when text complexity is defined there is no room for varied interpretations.
- The language used in the speaking and listening standards is not the language used in the study of the discipline. For example, page 36, grade band 4-5 "Reciting or performing readings with appropriate emotion and faithfulness to the text." The emphasis is on the language, not on the other aspects of presentation. It is recommended that this language be revised.
- Clarify the writing expectations regarding what is the physical act of writing as opposed to the concept creation. What students physically have the stamina to write as opposed to the stories they can create and verbalize are two very different considerations.

5. If you could add and/or remove ONE concept or skill, what would it be? Please provide an explanation/justification.

- Recognition of culture and cultural differences must be added. In a country that is comprised of a combination of cultures it is illogical to keep it from the document. Montana integrates the cultural heritage of Montana American Indians in all curricular areas as mandated by the state constitution.

6. Do you have any other general feedback about the draft standards?

- Ethics is missing from the entire document. Ethical and responsible uses of communication need to be considered as a civic responsibility.
- Writing to learn is entirely missing from the draft. It is a key type of writing that is recognized as important by major discipline experts.
- The communication process is missing from speaking and listening. Understanding the nature of communication helps communicators to recognize how communication breaks down and conversely how it can be enhanced.
- The types of speaking are artificially limited; the document identifies "Recitation and Reading Aloud" and "Classroom Discourse" only. This excludes a number of important types of communication, such as interpersonal communication, mass communication, and communication with an audience through media/technology.
- There is too much value placed upon argumentation. There are other ways in which critical thinking can be taught.

The Common Core presents a narrow lens for viewing communication arts as a discipline. Because the communication arts are so integrated into the world beyond academics and school, the standards must extend beyond a narrow focus. The Montana review panel looks forward to a revised document with an expanded view of English language arts.

# Response to Six Questions from CCSSO and NGA on the K-12 Mathematics Common Core

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1. Is the architecture of the draft standards clear and easy to follow? How can we ensure the documents are designed to be accessible for all audiences?

- No. Use language to communicate a common understanding of the math concept and skills to a variety of audiences including students and parents; rather than mathematical terminology that perpetuates math phobia (e.g., Kindergarten: "rank three objects by a shared attribute, and use transitivity to compare two objects indirectly.").
- To assist with the notion of being common, defining learning progression, as well as concepts and skills, will make it easier for all audiences to understand the content. It will also create an easier transition from the current set of differing definitions to a set of common definitions.
- Provide consistency in format by starting with the standard and using common titles, terms, and labels that are clear without the need for keys and attached lists. K-8 progression key was necessary because the notation was confusing (e.g., Nb was notation for Base Ten Computation; Gb is angles, lines, planes; Gc is geometric reasoning).
- The Connection section in the Middle and High School should either be dropped or replaced with an explanatory paragraph. Currently the Connections section does not provide a clear connection.

2. In what ways does this early draft convey a coherent vision of the discipline? What else is needed to enhance a coherent vision?

- The Developing Coherent Understanding in the K-8 section is an important component and appreciated. Thank you.
- If the vision is that All students are expected to enter a college level mathematics program, it is clear.
- With the present differences in documents, transitions from K-8 to 9-12 and to college and career remain an enormous challenge. How would the K-8, 9-12 and College and Career Readiness pieces be used for a coherent state program?
- Because it appears to be written by different people not one but several visions are presented. One voice to convey a coherent vision would be helpful.
- There should be consistency in a set of coherent K-12 standards and appropriate transitions for a vertical and horizontal articulation rather than adding and dropping topics along the way (e.g., data analysis does not start till seventh grade; Grades 5-7 do not have Quantity and Measurement and then Grade 8 has Irrational Numbers added to the Quantity and Measurement).

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3. To the extent that the early drafts provide progressions for grade level/grade span expectations does the document present a rigorous, yet reasonable continuum of expectations?

- It will take a completed document and further examination to determine if the changing of progression headings present rigor and reasonableness. The incompleteness affects the rigor (e.g., missing sequences in Middle and High which is important in function and modeling).
- Middle and High School contained overlaps with the K-8 expectations (e.g., function in grades 7-8 overlap with function in grades 9-12). The draft appears to follow the status quo of re-teaching.
- List of Progression Titles and Approximate Grade Ranges for K-8 shows reasonable progression; however, this progression is not articulated clearly in the document.
- Definition of progression would help to understand reasonableness (e.g., why is parameter in Block 8, yet really begins in Block 1 – slope in earlier blocks, which is a continuum, why is parameter at the end? Shouldn't it be when comparing graphs?).
- What is meant by endpoints in the Note to Reviewers? "The College and Career Ready Standard do not represent a high school exit standard, and it is our intention in the K-12 Standards to describe material leading to the various endpoints students aspire to in college and the workplace." This is confusing when K-12 repeats what is in the College and Career Ready Standards (e.g., Core Skill 2 for Functions).

4. Is the language in the early draft clear, concise, and precise? Please identify any areas where more concision and precision is needed.

- Language may be considered concise and precise for a mathematician; however, it does not articulate a common core that is clear to all audiences.
- The document may be considered concise; however, not understandable. Concise does not mean quality and useable or understandable.

5. If you could add and/or remove ONE concept or skill, what would it be? Please provide an explanation/justification.

- Culture!!! The inclusion of culture takes the standards to a level of application for All students and promotes the study of mathematics as a human endeavor.

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6. Do you have any other general feedback about the draft standards?

- Technology!!! Technology throughout the document would exemplify the Practices described in the College and Career Ready Standards as well as reach a 21<sup>st</sup> century set of standards.
- Will the Middle and High School be an inch deep and a mile wide when all the other progressions are included?

Moving forward with this significant initiative must be successful. This incomplete document does not represent a change in status quo. The significance goes without question; however, the manner with which the process and product are being developed undermines the potential success. The lack of time given to develop the common core places the quality and integrity of learning mathematics in jeopardy. The fear is that the end product will implode if development of standards continues at this speed, with the use of pure academic terminology only, the lack of cultural integration, and omission of 21<sup>st</sup> century skills.

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**Response to the questions about the sample high school mathematics progression.**

1. How should high school material be presented?

The document presents the progression of topics in blocks that can be accomplished regardless of grade level and course name. The material must be presented to articulate that students need to develop both mathematical skills and mathematical understandings. However, the current focus of the document is on rules and procedures, and not on students making sense of the mathematics, not on problem-solving and reasoning, not on exploring mathematical concepts. This is evident in the separation of “concepts” and “skills” in each area, the precise language used in speaking of the “skills,” and the vague language used in describing the “concepts.” Greater emphasis on students’ reasoning and making sense of mathematics and greater integration of concepts and skills must be made.

2. How would you use an arrangement into blocks (with connections between blocks indicated) in designing curriculum in your state?

In Montana each local district determines curriculum based on state content standards. Although the document can be used to minimize redundancy, the blocks are not very helpful in designing curriculum as written. What may be more helpful is to start with a block and then outline what is expected as students’ progress through their high school career, not just a list of skills/concepts for each block.

3. Do you want us to indicate different pathways through the high school standards, and, if so, how?

Please! The common core would do a great service to mathematics education if it recognized and indicated distinct pathways. This would clarify the learning and teaching progression and give us a better understanding of the intended meaning and use of these progressions. For example, technology provides different pathways for learning almost every mathematical concept in the high school curriculum.



The Montana K-12 English language arts and mathematics review panel members appreciate the opportunity to assist the Montana Office of Public Instruction staff with their review of the draft documents. The panel members strongly encourage the Council for Chief State Officers (CCSSO) and the National Governors Association (NGA) to include more K-12 teachers in all aspects of the development process.

The Montana review panel members agree with the philosophy behind a set of Common Core Standards. In fact, this is a prime opportunity for educational reform. However, Montana educators are opposed to an inferior document that will drive assessment. It is crucial that the document **clearly articulates** the criteria listed by the CCSSO and NGA, "Fewer, clearer, and higher; include rigorous content **and application of knowledge through high-order skills**; build upon strengths and lesson of current state standards; internationally benchmarked so that All students are prepared to succeed in our global economy and society; and be evidence and/or research based." Montana's review panel members concluded, after reviewing these two documents, that the criteria NGA and CCSSO has set for itself to develop standards, has not been met.

The language of the documents, which is further discussed in the content area reviews, is not appropriate as presented. The standards need to be clear, understandable, and free of jargon for all stakeholders.

The architecture of the standards must be consistent across content areas. An elementary level teacher should not have two separate documents of varying structure and language to guide instruction. The English language arts document identifies "key achievements," "core skills," and "foundations" within the document. In mathematics, the document identifies "developing coherent understanding," "progression headings," "progression key," "progression block," concepts, connections," and "skills, connections." Inconsistency of format makes the layout of the documents incongruent and difficult to decipher.

The review panel members were concerned by the lack of cultural integration in the standards. Montana has adopted into its Constitution Montana Code Annotated (MCA) 20-1-50, Indian Education for All, to recognize the cultural heritage of American Indians.

**Constitution of Montana -- Article X -- EDUCATION AND PUBLIC LANDS**  
**MCA 20-1-501 (Indian Education for All)**

20-1-501. Recognition of American Indian cultural heritage -- legislative intent. (1) It is the constitutionally declared policy of this state to recognize the distinct and unique cultural heritage of American Indians and to be committed in its educational goals to the preservation of their cultural heritage.

(2) It is the intent of the legislature that in accordance with Article X, section 1(2), of the Montana constitution:

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- (a) every Montanan, whether Indian or non-Indian, be encouraged to learn about the distinct and unique heritage of American Indians in a culturally responsive manner; and
  - (b) every educational agency and all educational personnel will work cooperatively with Montana tribes or those tribes that are in close proximity, when providing instruction or when implementing an educational goal or adopting a rule related to the education of each Montana citizen, to include information specific to the cultural heritage and contemporary contributions of American Indians, with particular emphasis on Montana Indian tribal groups and governments.
- (3) It is also the intent of this part, predicated on the belief that all school personnel should have an understanding and awareness of Indian tribes to help them relate effectively with Indian students and parents, that educational personnel provide means by which school personnel will gain an understanding of and appreciation for the American Indian people.

History: En. Sec. 1, Ch. 527, L. 1999.

The review panel members urge the working team of the K-12 Common Core Standards to include culture in the document to allow students in all states the opportunity to broaden their education with the inclusion of cultural awareness.